

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Mahmoud KHALIL,

*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

*Respondents.*

Case No. 25-cv-01963  
(MEF-MAH)

**NOTICE OF MOTION  
FOR PRELIMINARY  
INJUNCTION**

ORAL ARGUMENT  
REQUESTED

MOTION DATE:  
AUGUST 4, 2025

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declaration and exhibits, Petitioner Mahmoud Khalil, through counsel, hereby moves this Court for an order preliminarily enjoining the respondents from seeking to remove or detain Mr. Khalil based on the charge of removability under 8 U.S.C. § 1227 (a)(1)(A) based on alleged inadmissibility under 8 U.S.C. § 1182(a)(6)(C)(i) as set forth in the I-261, Additional Charges of Inadmissibility/Deportability of March 17, 2025 (the “Post-Hoc Charge”), as described in his memorandum and proposed order.

Pursuant to Local Rules 7.1 and 78.1, any opposition to this motion is due on or before July 21, 2025, and any reply is due on or before July 28, 2025.

Dated: July 9, 2025  
New York, New York

Respectfully submitted,  
/s/ Liza Weisberg

AMERICAN CIVIL LIBERTIES UNION OF NEW JERSEY FOUNDATION  
Jeanne LoCicero  
Farrin R. Anello  
Molly K.C. Linhorst  
570 Broad Street, 11th Floor  
Newark, New Jersey 07102  
973-854-1715

NEW YORK CIVIL LIBERTIES UNION FOUNDATION  
Amy Belsher\*  
Robert Hodgson\*  
Veronica Salama\*  
Molly Biklen\*  
125 Broad Street, 19th Floor  
New York, N.Y. 10004  
Tel: (212) 607-3300

AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
Omar Jadwat  
Noor Zafar\*  
Sidra Mahfooz\*  
Brian Hauss\*  
Esha Bhandari\*  
Vera Eidelman\*  
Tyler Takemoto\*  
Brett Max Kaufman\*  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel: (212) 549-2500

CENTER FOR CONSTITUTIONAL RIGHTS  
Baher Azmy  
Samah Sisay\*  
Diala Shamas\*  
666 Broadway, 7th Floor  
New York, NY 10012  
Tel: (212) 614-6464

CLEAR PROJECT  
MAIN STREET LEGAL SERVICES, INC.  
Ramzi Kassem\*  
Naz Ahmad  
Shezza Abboushi Dallal\*  
CUNY School of Law  
2 Court Square  
Long Island City, NY 11101  
Tel: (718) 340-4558

WASHINGTON SQUARE LEGAL SERVICES, INC.  
Alina Das\*  
Immigrant Rights Clinic  
245 Sullivan Street, 5th Floor  
New York, New York 10012  
Tel: (212) 998-6430

DRATEL & LEWIS  
Amy E. Greer  
29 Broadway, Suite 1412  
New York, NY 10006  
Tel: (212) 732-8805  
Fax: (212) 571-3792

VAN DER HOUT LLP  
Marc Van Der Hout (CA Bar #80778)\*  
Johnny Sinodis (CA Bar #290402)\*  
Oona Cahill (CA Bar #354525)\*  
360 Post St., Suite 800  
San Francisco, CA 94108  
Tel: (415) 981-3000  
Fax: (415) 981-3003

\* *Appearing Pro hac vice*

*Counsel for Petitioner*